

**IN THE UNITED STATES BANKRUPTCY COURT
OF THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: :
HARRISON J. PURDY JR. and : Case No: 1:15-bk-00146-HWV
DANIELLE Y. PURDY :
Debtors : Chapter 13
:
:
TOYOTA MOTOR CREDIT :
CORPORATION, :
Movant :
:
:
v. :
:
HARRISON J. PURDY JR. :
DANIELLE Y. PURDY :
Respondents :
:

**DEBTORS' ANSWER TO MOVANT'S MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW COME, Debtors, Harrison J. Purdy Jr. and Danielle Y. Purdy, by and through their attorneys, Jacobson, Julius & Harshberger, and hereby file this Answer to Movant's Motion for Relief From the Automatic Stay and in support thereof states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted. By way of additional response, Debtors' confirm plan crammed down the vehicle that is the subject of this motion.
7. Admitted. By way of additional response, unfortunately the Debtor lost his job and was unable to pay the Trustee for a time. Debtor is still unemployed but is now receiving unemployment such that he can pay the current plan arrears and resume payments. Debtor will

be filing a motion to modify plan to cure all arrears shortly. It is anticipated that the motion to modify plan will be pending before this honorable court before hearing on this motion.

8. Admitted. The amended plan should cure the arrears going forward and resume adequate protection payments to the Movant.

9. Admitted.

10. Denied. Paragraph ten of Movant's motion is a conclusion of law to which no response is required.

11. Denied. Paragraph eleven of Movant's motion is a conclusion of law to which no response is required.

WHEREFORE, Debtors respectfully requests that this Honorable Court deny Movant's Motion For Relief From the Automatic Stay and further requests any other relief deemed necessary and just.

Respectfully Submitted,
JACOBSON, JULIUS, & HARSHBERGER

Dated: October 10, 2018

s/Chad J. Julius
ID# 209496
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717.909.5858

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CERTIFICATE OF SERVICE

I, Colleen Reed, of Jacobson, Julius & Harshberger, do hereby certify that on this day I served the within Respondent's Answer to Movant's Motion For Relief From The Automatic Stay upon the following persons via the ECF/CM system and/or by depositing a true and correct copy of the same in the United States Mail, first class, postage prepaid:

ECF/CM:

Charles J. Dehart III, Esquire (Trustee) 8125 Adams Drive, Suite A Hummelstown, PA 17036	James C. Warmbrodt, Esq. KML LAW GROUP, P.C. Suite 5000-BNY Independence Center 701 Market Street Philadelphia, PA 19106-1532
United States Bankruptcy Court Ronald Reagan Federal Building 228 Walnut Street, Room 320 Harrisburg, PA 17108	

s/ Colleen Reed
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Dated: October 10, 2018